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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

THOMAS A. O'CONNELL,

Plaintiff,

v.

AMERICAN EXPRESS COMPANY;  
BANK OF AMERICA; JPMORGAN  
CHASE BANK, NA; FRANKLIN  
CAPITAL CORPORATION;  
SHELL/CBNA; SYNCB/CHEVRON;  
WELLS FARGO/DILLARDS; and  
EQUIFAX INFORMATION  
SERVICES, LLC,

Defendants

Case No. 2:18-cv-00743-RFB-CWH

**JOINT STIPULATION EXTENDING TIME  
FOR DEFENDANT SYNCHRONY BANK TO  
FILE AND SERVE A RESPONSE TO  
PLAINTIFF'S COMPLAINT; [PROPOSED]  
ORDER**

Assigned to: Judge Richard Franklin Boulware II  
Referred to: Magistrate Judge Carl W. Hoffman

Compl. Filed: April 24, 2018

**JOINT STIPULATION**

Plaintiff Thomas A. O'Connell ("Plaintiff") and Defendant Synchrony Bank ("Synchrony") (together, the "Stipulating Parties") hereby stipulate and agree, by and through their attorneys of record, as set forth below:

WHEREAS, Plaintiff filed a Complaint on April 24, 2018;

WHEREAS, Synchrony received the Complaint on May 8, 2018;

WHEREBY, Synchrony requested and Plaintiff agreed to extend Synchrony's time to file and serve a response to Plaintiff's Complaint to June 26, 2018;

1 For the foregoing reasons, the Parties request this Court grant their Joint Stipulation  
2 extending Synchrony's time to file and serve a response to Plaintiff's Complaint to June 26, 2018.

3  
4 **IT IS SO STIPULATED.**

5  
6 DATED: May 25, 2018

HAINES & KRIEGER, LLC

7 By: /s/ Rachel B. Saturn

8 Rachel B. Saturn

9 Attorney for Plaintiff

10  
11 DATED: May 25, 2018

WEINSTEIN & RILEY, P.S.

12 By: /s/ Aaron M. Waite

13 Aaron M. Waite

14 Attorney for Defendant Synchrony  
15 Bank

16 **PROPOSED ORDER**

17 **IT IS SO ORDERED.**

18 DATED: May 29, 2018

19   
United States District Judge  
United States Magistrate Judge